

**3M Environmental Engineering  
and Pollution Control**

PO Box 33331  
St. Paul, Minnesota 55133-3331  
612/778 4791

 **EPA-OTS**



0006008750

90-890000023

*(Extension)*  
**CONTAINS NO CBI**

February 28, 1988

**3M**

Certified Mail

TSCA Document  
Processing Center (TS790)  
Office of Toxic Substances  
U.S.EPA, Room L-100  
401 M St., S.W.  
Washington, D.C. 20460

89 MAR -6 PM 2:25  
DIS DOCUMENT CONTROL  
OFFICE

Attn: CAIR Reporting Extension

Dear Sir/Madam:

Minnesota Mining and Manufacturing (3M Co.) believes it is unlikely that we will be able to complete the CAIR report for two chemicals by June 7, 1989, as required by FR 2-15-89 P6918. We are therefore requesting an extension of one month to July 6, 1989, as provided under 40 CFR 704.215(b) for the following chemicals:

- 1) Benzene, 2,4-diisocyanato-1-methyl- CAS #584-84-9
- 2) Benzene, 1,3-diisocyanatomethyl- CAS #26471-62-5

Justification for this request includes the following:

1. Our plant operations for these items are very widespread and diverse, we will be reporting on one or more processes at about seven different sites. Several 3M divisions are involved.
2. Our corporate TSCA compliance staff group will be coordinating the assembly of information and will do the actual report preparation. This means that we will be working with numerous individuals in the various 3M operations which are involved. Relevant to this is the fact that the key person in respect to leadership and knowledge of CAIR is on maternity leave. This leaves me as the only staff person responsible for coordination of the required reports.

U.S.EPA  
Page 2  
February 28, 1989

3. The people who are responsible for answering the questions at our various processing sites are asking many questions about how the reporting forms relate to their particular operations. I have submitted 20 or more questions in a letter to the EPA, and expect that more questions will follow. When received, the answers to these complex questions will be studied and must be understood before we will be able to fill out certain parts of the report.

Please advise me of your response to this request, either by letter or phone. My phone number is 612/778-7570.

Sincerely,

  
John L. Reitter  
Sr. Regulatory Chemist  
Corp. TSCA Compliance

JLR/mb